

advertisements. As the D.C. Circuit stated, “[t]he effectiveness of the nonsmoking messages may have been enhanced...by their juxtaposition against cigarette advertisements.”⁸⁰ Finally, the FCC must require broadcasters to air counter-ads for free. Having accepted alcohol ads that reach such a huge audience of underage youth and pose such a danger to the public’s health and welfare, the broadcasters, as public trustees, cannot properly take the position that they will permit the audience to be informed by counter-ads only if they are compensated. As a further matter, we note that in view of broadcasters recent receipt of valuable spectrum, requiring broadcasters to air free alcohol counter-ads is certainly not unreasonable. We are confident that concerned organizations would fund the production of the counter-ads.

IV. CONCLUSION

High risk alcohol consumption has had a significant negative impact upon the nation’s economy and welfare. Its far-reaching effects have jeopardized the health of all Americans, from infants to adults, but especially young people who are plagued by the problems of underage drinking. Youth lack important information that would allow them to understand the hazards of alcohol consumption, as well as to resist the advertising of the beer, wine and distilled spirits industries. Thus, the FCC should require broadcasters that air alcohol advertisements to air a significant amount of counter-ads that expose the unglamorous side of alcohol consumption and provide needed information on avoiding high risk alcohol use.

⁸⁰U.S. Dep’t of Health and Human Services, Public Health Rep. 105, Past Lessons and New Uses of Mass Media in Reducing Tobacco Consumption at 239-244.

Respectfully submitted,



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APPENDIX

Description of Organizations

NATIONAL COUNCIL ON ALCOHOLISM AND DRUG DEPENDENCE, INC. (NCADD)

Established in 1944, NCADD is a national voluntary health organization of over 100 national affiliates that provides education and help for those fighting alcohol and drug addictions.

MOTHERS AGAINST DRUNK DRIVING (MADD)

MADD was founded in 1980 and is a volunteer grassroots non-profit organization whose mission is to stop drunk driving and support victims of this violent crime. MADD has more than 3 million members and supporters nationwide and more than 600 chapters and community action teams in 48 states, and is the largest victims' support organization in the world, as well as one of the leading advocacy groups addressing the issues of impaired driving and underage drinking.

AMERICAN ACADEMY OF PEDIATRICS

AMERICAN COLLEGE OF NURSE-MIDWIVES (ACNM)

ACNM is the professional association for certified nurse-midwives in the United States. Today, there are over 5,000 certified nurse-midwives in all 50 states and U.S. territories. The mission of ACNM is to develop and support the profession to promote the health and well-being of women and infants within their families and communities.

AMERICAN COUNCIL ON ALCOHOL PROBLEMS (ACAP)

ACAP unites state temperance organizations, national religious bodies and similar concerned groups in America to deal with problems caused by alcohol and other drugs. Membership of ACAP presently is made up of 36 state temperance organization, 22 national Christian denominations, and other fraternal organization which support ACAP's philosophy of abstinence.

AMERICAN SOCIETY OF ADDICTION MEDICINE (ASAM)

ASAM is a professional medical society whose 3,000 members are involved in treatment, research, education, and prevention of alcohol, nicotine and other drug dependencies. ASAM promotes public policies to increase availability and effectiveness of treatment, and publishes criteria for treatment of addictions.

CENTER FOR SCIENCE IN THE PUBLIC INTEREST (CSPI)

CSPI is a non-profit health-advocacy organization that focuses on alcoholic beverage problems, nutrition and food safety. Based in Washington, D.C., it is supported in large part by the 900,000

subscribers to its Nutrition Action Healthletter. It does not accept funding from industry or government.

CENTRAL NEBRASKA COUNCIL ON ALCOHOLISM

Central Nebraska Council on Alcoholism is a small not-for-profit agency which has worked for the past 30 years to increase the awareness of the harmful effects of alcohol, tobacco and other drug addictions together with their related problems through information dissemination, education, referrals, and community organizing.

THE CHRISTIAN LIFE COMMISSION OF THE SOUTHERN BAPTIST CONVENTION

The Christian Life Commission is the public and religious liberty agency for the Southern Baptist Convention, the largest Protestant denomination in the United States, with over 16.5 million members. The Christian Life Commission handles all moral and public policy issues which directly pertain to Southern Baptist Convention members.

THE COMMONWEALTH PREVENTION ALLIANCE

The Commonwealth Prevention Alliance was established in 1976 to create a system of communication, support and resource sharing among people involved in prevention in Pennsylvania. Throughout its history, the Alliance has worked to improve the quality of prevention programming and the professionalism of the field throughout the state. The Alliance supports a wide variety of measures to prevent alcohol and other drug-related problems.

GENERAL BOARDS OF GLOBAL MINISTRIES ON CHURCH AND SOCIETY/UNITED METHODIST CHURCH

THE LATINO COUNCIL ON ALCOHOL AND TOBACCO (LCAT)

LCAT is a national non-profit organization created in 1989 to reduce the enormous harm that alcohol and tobacco use and abuse causes in the Latino community. LCAT advocates prevention measures ranging from education to legislation to promote better health among children and adults. LCAT publishes a newsletter and writes articles to inform the public and policy makers of trends, concerns and activities in the areas of tobacco, alcohol and substance abuse in the Latino community.

THE MANOCHERIAN FOUNDATION

THE MARIN INSTITUTE FOR THE PREVENTION OF ALCOHOL AND OTHER DRUG PROBLEMS

The Marin Institute is a private non-profit organization which focuses on public policy, research, data collection, training, community organizing and media advocacy.

MARYLAND UNDERAGE DRINKING PREVENTION COALITION

Maryland Underage Drinking Prevention Coalition is comprised of over 1,500 individuals and community groups from across the state of Maryland who work diligently within their local communities to prevent the use of alcohol, and other drugs, by persons under 21 years of age. In 1993 they formed the Maryland Underage Drinking Prevention Coalition, increasing their influence through a "strength in numbers" approach.

NATIONAL ASSOCIATION OF ALCOHOLISM AND DRUG ABUSE COUNSELORS (NAADAC)

With a membership of 17,000, NAADAC is the largest national organization representing the interests of alcoholism and drug abuse professionals across the United States. Founded in 1972, NAADAC is committed to increasing general awareness of alcoholism and drug abuse and enhanced care of individuals through treatment, education and programs aimed at prevention.

NATIONAL ASSOCIATION OF PUBLIC HEALTH PROFESSIONALS - COUNCIL ON ALCOHOL POLICY

National Association of Public Health Professionals - Council on Alcohol Policy is a non-profit membership organization dedicated to advancing public health policy.

NATIONAL ORGANIZATION FOR VICTIM ASSISTANCE (NOVA)

Founded in 1975, NOVA is the oldest victim rights group in the worldwide victims' movement. A non-profit, tax-exempt membership organization, NOVA is guided by four purposes: to serve its members, to provide educational services to victim assistance and allied professionals, to be of direct service to victims of crime and other traumatic events, and to be an advocate for victim rights and services.

NATIONAL PTA

The National PTA, founded in 1897, encourages its 6.5 million members to be involved in key child education, health and welfare issues. The organization serves as an advocate for children and families in schools, the community and before government agencies.

NATIONAL VICTIM CENTER (NVC)

NVC, a non-profit organization based in greater Washington, D.C., is a leading advocate of crime victims' rights. NVC promotes the responsiveness of the criminal justice system to the rights and needs of crime victims, and works to increase public awareness concerning their plight. NVC has an interest in this petition as a leading representative of the interests of numerous victims of violence.

NATIONAL WOMEN'S CHRISTIAN TEMPERANCE UNION

ST. VINCENT COLLEGE PREVENTION PROJECTS

The St. Vincent College Prevention Projects, is a collaborative effort founded in 1978 between Saint Vincent College, the Westmoreland County Drug and Alcohol Commission, the Latrobe Area Chamber of Commerce and the school districts in Westmoreland County, Pennsylvania. They also provide training and consultation to five other Pennsylvania counties. The Projects' seek to promote wellness in people and systems in order to prevent alcohol, tobacco, and other drug abuse, violence, and other socially destructive behaviors.

TEMPERANCE LEAGUE OF KENTUCKY

The goal of the Temperance League of Kentucky is to provide a spiritual ministry by extending the work of the church and its concern for the welfare of mankind and by urging Christian action on moral issues, with special emphasis on correcting the problems caused by the use of alcohol.

TRAUMA FOUNDATION CENTER ON ALCOHOL ADVERTISING

The Center on Alcohol Advertising works with national and regional groups committed to the health and welfare of children and youth to identify and support actions that will stop the unethical exposure of young people to messages that promote the use of alcohol. Through the use of mass media, the Center educates legislators, community leaders and the general public about policy changes that can protect children and youth from continual exposure to alcohol advertising and promotion.

VICTIMS RIGHTS POLITICAL ACTION COMMITTEE

The Victims Rights Political Action Committee acts as an advocate for victims of crimes at all levels of government. Created in 1992, it seeks to ensure that victims of crime are listened to in law enforcement investigations, the criminal justice process, and civil proceedings.